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4 UNITED STATES DISTRICT COURT
5 NORTHERN DISTRICT OF CALIFORNIA
6
7 SAN JOSE DIVISION

8 REGENTS OF THE UNIVERSITY OF
9 MINNESOTA,

10 Plaintiff,

11 v.

12 LSI CORPORATION AND AVAGO
13 TECHNOLOGIES U.S. INC.,

14 Defendant.

Civil Action No. 5:18-cv-00821-EJD-NMC

**[PROPOSED] ORDER GRANTING
PLAINTIFF'S MOTION TO COMPEL
DISCOVERY**

15 Before the Court is Plaintiff Regents of the University of Minnesota's ("UMN") Motion to
16 Compel Discovery ("Motion"). *See* Dkt. 116. Prior to the Court's June 28, 2023 hearing on the
17 Motion, the parties resolved the issues raised in Sections B-D of UMN's brief in support of the
18 Motion. *See* Dkt. 118.

19 The parties, however, did not resolve their dispute over Section A of UMN's brief, which
20 addresses Defendants' objections to discovery that they claimed regard "actions or products outside
21 of the territory of the United States," including "worldwide revenue numbers for all sales of the
22 Accused Products." By its Motion, UMN seeks an order compelling Defendants to produce
23 documents in response to twelve document requests and provide responses to six interrogatories
24 that have been withheld due to such objections.

25 The Court held a hearing on June 28, 2023 on this discovery dispute. Based upon the
26 Court's consideration of the parties' briefing (Dkt. 116-128, 172, 177, 245, 248) and oral
27 argument in support and opposition thereto, the Court rules as follows:
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1 The Court **OVERRULES** Defendants' objections that the requested discovery is not
2 relevant to the claims and defenses in this case, and is unduly burdensome and not proportionate
3 to the needs of the case; and the Court **GRANTS** UMN's motion to compel production of
4 documents in response to Document Request Nos. 5, 11, 14-19, 21, 23 and 25-26 and answers to
5 Interrogatory Nos. 3-5 and 10-12 that have been withheld due to such objections.

6 Defendants shall produce the documents responsive to the identified Document Requests
7 and respond to the identified Interrogatories consistent with this Order within 14 days of this
8 Order.

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10 IT IS SO ORDERED.

11 Dated: July _____, 2023

12 By: _____
13 Hon. Nathanael M. Cousins
14 U.S. Magistrate Judge
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1 Respectfully submitted,

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3 Dated: July 5, 2023

4 By: /s/ Christopher M. Verdini

K&L GATES LLP

5 Edward P. Sangster (SBN 121041)

6 ed.sangster@klgates.com

7 Jas Dhillon (SBN 252842)

8 jas.dhillon@klgates.com

9 Four Embarcadero Center, Suite 1200

10 San Francisco, California 94111

11 Tel: (415) 882-8200

12 Fax: (415) 882-8220

13 Patrick J. McElhinny, *pro hac vice*

14 patrick.mcelhinny@klgates.com

15 Mark G. Knedeisen, *pro hac vice*

16 mark.knedeisen@klgates.com

17 Christopher M. Verdini, *pro hac vice*

18 christopher.verdini@klgates.com

19 Anna Shabalov, *pro hac vice*

20 anna.shabalov@klgates.com

21 K&L Gates Center

22 210 Sixth Avenue

23 Pittsburgh, Pennsylvania 15222

24 (412) 355-6500

25 Theodore J. Angelis, *pro hac vice*

26 theo.angelis@klgates.com

27 925 Fourth Avenue, Suite 2900

28 Seattle, WA 98104

(206) 623-7580

Counsel for Plaintiff

Regents of the University of Minnesota

By: /s/ Kristopher L. Reed

KILPATRICK TOWNSEND & STOCKTON
LLP

Kristopher L. Reed (SBN 235518)

kreed@kilpatricktownsend.com

2001 Ross Avenue, Suite 4400

Dallas, TX 75201

Telephone: (214) 922-7143

Facsimile: (214) 922-7101

April E. Isaacson (SBN 180638)

aisaacson@kilpatricktownsend.com

Two Embarcadero Center, Suite 1900

San Francisco, CA 94111

Telephone: (415) 576-0200

Facsimile: (415) 576-0300

Edward J. Mayle (admitted *pro hac vice*)

tmayle@kilpatricktownsend.com

1400 Wewatta St., Suite 600

Denver, CO 80202

Telephone: (303) 571-4000

Facsimile: (303) 571-4321

Kathleen R. Geyer (admitted *pro hac vice*)

kgeyer@kilpatricktownsend.com

1420 Fifth Ave., Ste. 3700

Seattle, WA 98101

Telephone: (206) 467-9600

Facsimile: (206) 623-6793

*Counsel for Defendants LSI Corporation and
Avago Technologies U.S. Inc.*

CERTIFICATION PURSUANT TO CIV. L. R. 5-1(i)(3)

Pursuant to Civil Local Rule 5-1(i)(3), I hereby certify that concurrence in the filing of this document has been obtained from the signatories for whom a signature is indicated by a conformed signature (/s/). I have on file records to support this concurrence for production for the Court if so ordered.

Dated: July 5, 2023

/s/ Christopher M. Verdini